

EXHIBIT 6

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

EDEN ROGERS and

BRANDY WELCH,

Plaintiffs,

vs.

CASE NO. 6:19-cv-01567-TMC

UNITED STATES DEPARTMENT OF HEALTH
AND HUMAN SERVICES;
ALEX AZAR, in his official capacity as SECRETARY of
the UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
ADMINISTRATION FOR CHILDREN AND FAMILIES;
LYNN JOHNSON, in her official capacity as ASSISTANT
SECRETARY of the ADMINISTRATION FOR CHILDREN AND
FAMILIES;
SCOTT LEKAN, in his official capacity as PRINCIPAL
DEPUTY ASSISTANT SECRETARY of the ADMINISTRATION
FOR CHILDREN AND FAMILIES;
HENRY MCMASTER, in his official capacity as
GOVERNOR of the STATE OF SOUTH CAROLINA;

MICHAEL LEACH, in his official capacity as STATE
DIRECTOR of the SOUTH CAROLINA DEPARTMENT OF SOCIAL
SERVICES,

Defendants.

VIDEOTAPED

DEPOSITION OF: JACQUELINE LOWE
(APPEARING VIA VIRTUAL ZOOM)

DATE: June 3, 2021

TIME: 9:27 AM

REPORTED BY: TERRI L. BRUSSEAU
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6 (INDEX AT REAR OF TRANSCRIPT)
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1 Q. Okay. And that caseworker is -- as a
2 DSS employee is not affiliated with the private CPA
3 that might be involved with the family, right?

4 A. Yes, there's a DSS caseworker.

5 Q. Okay. And you had mentioned earlier, I
6 think we had said that about 50/50, about half of
7 the foster families in the state are recruited by
8 private CPAs and about half of them are recruited
9 directly by DSS, is that right?

10 A. Yes. Roughly, yes.

11 Q. Roughly. And how does -- how does DSS
12 go about recruiting families to serve as foster
13 families?

14 A. The Department fosters with the state
15 foster parent association, who also message the
16 need for foster families. They go about
17 information on social media, print media, other
18 groups that partner with the Department through
19 billboards, messaging, some of the same recruitment
20 efforts as our child placing agencies.

21 Q. Okay. And then what is the -- well,
22 just -- let me back up for a second.

23 Does DSS recruit through particular
24 communities, through churches or other houses of
25 worship, for instance?

1 Q. Okay. So you said about a year or so
2 ago there was a change such that DSS is only
3 handling directly families that are interested in
4 providing kinship care? Did I get that right?

5 A. That's correct.

6 Q. Okay. And when we talk about kinship
7 care, what does that mean?

8 A. So the kinship care are those children
9 who are entering care and instead of going to an
10 unrelated individual or family, that the Department
11 would identify a relative or a next of kin, some of
12 the kin being someone who has a significant
13 relationship with the child, who knows that child
14 and is interested in being licensed to care for
15 that child to prevent going into an unrelated
16 foster family home.

17 Q. Okay. And so currently then and for
18 about the past year, families that were seeking to
19 become foster families outside of the kinship care
20 piece of it, they no longer have the opportunity of
21 working directly with DSS to go through the
22 application and licensing process, is that right?

23 A. The focus is that DSS would do the kin.
24 Now, if the family is unable to work with a CPA,
25 they certainly would come to DSS. I mean, we are

1 whether someone -- what faith somebody ascribes to
2 and whether they could be a good parent?

3 A. No.

4 Q. So has DSS ever become aware that any
5 other child placing agency apart from -- I'm going
6 to stop sharing my screen. We don't need to look
7 at these topics anymore. Sorry, everybody. There
8 we go. I'll start over.

9 Has DSS ever become aware that any
10 other CPA apart from Miracle Hill discriminates
11 against prospective foster parents on the basis of
12 their religion?

13 A. Not that I'm aware of.

14 Q. How about on the basis of sexual
15 orientation?

16 A. No, not that I'm aware of.

17 Q. Did DSS ever become aware that
18 Southeastern Children's Home discriminates against
19 prospective foster parents on the basis of their
20 religion?

21 A. Not that I'm aware of.

22 MS. JANSON: Cris, do you want to
23 show -- do you want to put up Tab 28 for me?

24 MR. RAY: That exhibit has been
25 introduced.

1 MS. JANSON: Okay. Great.

2 BY MS. JANSON:

3 Q. Before we look at that specifically, is
4 South -- is Southeastern Children's Home a private
5 CPA in South Carolina?

6 A. It is.

7 Q. Do you know -- do you know which region
8 it serves?

9 A. Upstate.

10 Q. It serves the upstate. Okay. And if
11 we take a look at that document in particular -- so
12 we've marked as -- are we on Exhibit 12?

13 MR. RAY: Yes, that's right.

14 MS. JANSON: 12. Okay.

15 (EXHIBIT 12, E-mail dated 10/30/19 to
16 [REDACTED] from Reid Lehman,
17 MIRACLE_HILL_SUBP_003524, was marked for
18 identification.)

19 BY MS. JANSON:

20 Q. We've marked as Exhibit 12 an e-mail
21 from Reid Lehman to -- it looks like someone with
22 an e-mail address [REDACTED] dated October
23 30th of 2019.

24 Have you seen this document before,
25 Miss Lowe?

1 A. I have not.

2 Q. Okay. Take a minute to scan over it
3 and then I'll ask my questions.

4 A. Okay.

5 Q. So in that -- I guess it's the third
6 paragraph down here, Mr. Lehman asks of the
7 recipient of the e-mail, who it looks from the
8 e-mail address is, you know, someone affiliated
9 with Southeastern Children's Home. He says: Would
10 you be -- Robert, would you be willing for me to
11 tell -- sorry. Let me back up.

12 First sentence of the e-mail,
13 Mr. Lehman says Michael Leach will be coming to
14 tour portions of Miracle Home Ministries next
15 Tuesday.

16 Michael Leach is the current director
17 of DSS, right?

18 A. Yes.

19 Q. And then in the third paragraph
20 Mr. Lehman writes: Would you be willing for me to
21 tell him, him being Michael Leach, that
22 Southeastern Children's Home and your board's
23 expectation that you'll recruit only among the
24 churches of Christ.

25 Do you see that there?

1 A. I do.

2 Q. Does that -- does that suggest to you
3 that Southeastern Children's Home will not work
4 with prospective foster parents who are not members
5 of the churches of Christ?

6 A. Right. It indicates they would recruit
7 only among churches of Christ.

8 Q. But DSS -- has DSS been aware that this
9 is a policy of Southeastern Children's Home?

10 A. No.

11 Q. No. And has DSS ever -- ever become
12 aware that Epworth discriminates against
13 prospective foster parents on the basis of their
14 sexual orientation?

15 A. I've not been aware.

16 MS. JANSON: Cris, why don't we look at
17 Tab 27. We'll make that Exhibit 13 if we can.

18 MR. RAY: That exhibit has been
19 introduced.

20 (EXHIBIT 13, E-mail chain dated
21 10/31/19 to Reid Lehman from Beth Williams,
22 MIRACLE_HILL_SUBP_003561 to 003563, was marked for
23 identification.)

24 MS. JANSON: Great. Okay.

25 BY MS. JANSON:

1 Q. So we've marked as Exhibit 13 an e-mail
2 chain between Beth Williams and Reid Lehman from
3 October 31st, 2019 and it has the Bates Number
4 Miracle_Hill_Subp_003561 through 3562 (sic). Do
5 you have that in front of you?

6 A. I do now.

7 Q. Just go ahead and take a look at that.

8 A. Okay.

9 Q. Have you seen this document before?

10 A. I have not.

11 Q. Looking down about halfway -- halfway
12 down the page, there's an e-mail from Mr. Lehman
13 and he's writing to Beth Williams.

14 A. Okay.

15 Q. Do you know whether this Beth Williams
16 who works at Epworth is the same Beth Williams who
17 you addressed your letter to, your January 26, 2018
18 letter to, to Miracle Hill?

19 A. Yes, it's the same Beth Williams.

20 Q. Okay. So at some point after January
21 2018 and before October of 2019 she left Miracle
22 Hill and went to work at Epworth?

23 A. That is correct.

24 Q. Okay. And Epworth, as we talked about,
25 is another CPA that serves the upstate region,

1 right?

2 A. Portions of the upstate, but it's based
3 in the midlands or Columbia.

4 Q. Okay. But it does have a -- it does
5 have a presence in that state?

6 A. Yes, it does. Yes.

7 Q. Okay. And then -- and then looking at
8 the document, Mr. Lehman writes, Beth, and then I'm
9 skipping a couple of the paragraphs there, but he
10 says: Michael Leach will be coming to tour
11 portions of Miracle Hill -- MHM, Miracle Hill
12 Ministries -- next Tuesday. It says that he
13 continues to believe that Miracle Hill is the only
14 agency that needs the waiver granted by HHS and
15 then would you be willing for me to tell him about
16 Epworth and your denomination's expectation that
17 you'll recruit heterosexual couples. Do you see
18 that there?

19 A. I do.

20 Q. Has -- was -- has DSS been aware that
21 Epworth will only recruit heterosexual couples?

22 A. No.

23 Q. But you would agree with me that that
24 is, in fact, what the language in this document
25 suggests, right?

1 A. It does.

2 Q. At any point has DSS become aware that
3 there is another -- another CPA that discriminates
4 against potential foster parents on the basis of
5 their marital status?

6 A. Not that I'm aware of.

7 MS. HANSON: Okay. Let's look at Tab
8 18 if we can, Cris.

9 MR. RAY: That has been introduced.

10 (EXHIBIT 14, E-mail chain dated 5/1/18
11 to Beth Williams from REDACTED,
12 MIRACLE_HILL_SUBP_002301 to 002303, was marked for
13 identification.)

14 BY MS. JANSON:

15 Q. Let me know when you have that in front
16 of you.

17 A. Still coming up.

18 Q. Okay.

19 MR. RIDDLE: Taking a moment.

20 THE WITNESS: Okay. I have it.

21 BY MS. JANSON:

22 Q. Okay. Great. So we've marked as
23 Exhibit 14 a document that is an e-mail chain
24 from -- between Beth Williams and a redacted
25 recipient dated May 1st of 2018. Subject line, re

1 was refusing to work with prospective foster
2 parents if they were -- based on their marital
3 status and living arrangements?

4 A. I'm not aware.

5 Q. What's being talked about here is
6 not -- doesn't sound familiar to you?

7 A. I have not been made aware of these
8 letters or these instances and this is the first
9 time I'm seeing these communications.

10 Q. Okay. And I think you told me -- you
11 said earlier that apart from Miracle Hill and apart
12 from the two -- the three examples that we've just
13 gone over, DSS is not aware of any other CPAs that
14 discriminate against prospective foster parents on
15 the basis of religion, is that right?

16 A. Right. I'm not aware of any.

17 Q. And how about on the basis of sexual
18 orientation?

19 A. Same.

20 Q. But based on -- based on what we've --
21 we have just discussed, would you agree with me
22 that Miracle Hill is not the only CPA serving the
23 upstate region that discriminates based on religion
24 and/or sexual orientation?

25 MR. COLEMAN: Object to the form of the

1 question.

2 COURT REPORTER: Who was that, please?

3 BY MS. JANSON:

4 Q. I'm sorry, I missed your answer.

5 COURT REPORTER: I didn't hear an
6 answer and who objected, please?

7 MR. COLEMAN: It was Miles Coleman that
8 objected.

9 COURT REPORTER: Thank you. And, Miss
10 Lowe, I didn't hear your answer. If you did
11 answer, would you please repeat it?

12 THE WITNESS: I didn't answer. I was
13 waiting. But based on the information submitted,
14 yes, there would be discrimination based on sexual
15 orientation or religion for these documents.

16 BY MS. JANSON:

17 Q. By -- by these -- these CPAs that we've
18 discussed, which are separate and apart from
19 Miracle Hill, right?

20 A. Yes.

21 Q. We spoke -- we spoke earlier about
22 DSS's own nondiscrimination policy, and I just want
23 to pull -- I just want to pull that up quickly if
24 we -- if we can.

25 MS. JANSON: So Cris, this is Tab 38.

1 Q. Okay. Do you know if there had been
2 such conversations, would there likely to be
3 documents that -- that would reflect those
4 discussions?

5 A. I don't know.

6 Q. Okay. And earlier we talked about how
7 DSS issued Miracle Hill a couple of temporary
8 licenses and then ultimately in January of 2019
9 issued Miracle Hill a permanent license at Governor
10 McMaster's direction, right?

11 A. A standard license, yes.

12 Q. And had Governor McMaster not
13 intervened, would -- would DSS have required
14 Miracle Hill to issue and implement the compliance
15 plan that DSS requested in your January 26, 2018
16 letter to Miracle Hill?

17 MR. COLEMAN: Object to the form of the
18 question.

19 COURT REPORTER: Was that you, Miles?

20 THE WITNESS: Yes.

21 COURT REPORTER: Miles, was that you?

22 MR. COLEMAN: Yeah, that was me.

23 BY MS. JANSON:

24 Q. And that letter which again we marked
25 as an Exhibit 7 -- Exhibit 7, your letter to

1 when the waiver was granted until before when DSS
2 made the shift to focusing on the kinship care.

3 You said you did -- you have seen --
4 you have seen -- you saw during that period since
5 after the waiver was issued, you saw a decline in
6 the number of applications that DSS received from
7 prospective foster parents?

8 A. Overall. So I believe, if I remember,
9 in '18 it went up a little bit, but then it's been
10 declining '19 and certainly during 2020 there was a
11 decline.

12 Q. And is that just the number -- a
13 decline in the number of applicants that have gone
14 through the application and home study process
15 directly with DSS or is that total, including
16 coming from -- including those who would have gone
17 through the licensing process through the private
18 CPA?

19 A. That's total.

20 Q. Total. Before Governor McMaster's
21 office intervened in the issue between DSS and
22 Miracle Hill with respect to Miracle Hill's
23 license, was DSS prepared to end its relationship
24 with Miracle Hill as a -- as a licensed CPA if
25 Miracle Hill did not comply with the requirements

1 set forth in your January 2018 letter?

2 A. DSS was prepared to terminate the child
3 placing agency license.

4 Q. So we've generally been speaking in
5 your capacity as a representative of DSS. I have a
6 few questions I wanted to ask you just in your
7 personal -- in your personal capacity.

8 And one of those is: Have you
9 personally -- have you ever had conversations with
10 others at DSS or with leadership at DSS about how
11 allowing CPAs to exclude families based on their --
12 their religious beliefs would impact the pool of
13 foster parents available in South Carolina?

14 A. I have not.

15 Q. You have not. Okay. And are you
16 generally aware of if some of the professional
17 standards that govern in the -- in the field of
18 child welfare?

19 A. Yes.

20 Q. And -- and are those standards
21 generally the ones published by CWLA or the Child
22 Welfare League of America?

23 A. Yes.

24 Q. Okay. And does -- and you're familiar
25 with CWLA?

1 If you have it in front of you, that's
2 fine. I don't think you need to pull it up in
3 front of you if you don't.

4 A. I have it.

5 Q. Basically -- okay. Basically what I
6 want to do is I'm going to try to go through in
7 alphabetical order. I just want to -- just so
8 that -- so we've got a clear record and so my own
9 notes can get clearer, figure out which CPAs are
10 operating in the upstate that offer nontherapeutic,
11 perhaps along with therapeutic care, whether they
12 have an office in the upstate and approximately how
13 long they've been licensed.

14 So I think we can -- we can run through
15 these hopefully without it being too tedious, but I
16 apologize in advance if it is a little bit
17 mechanical. So I'm trying to go through them.

18 Church of God Home For Children. They
19 offer nontherapeutic care and they have an office
20 in the upstate, right?

21 A. Yes.

22 Q. And they've been licensed I think you
23 said for maybe ten years or so, is that ballpark
24 correct?

25 A. Yes.

1 Q. Okay. Connie Maxwell Children's
2 Ministries, they are also in the upstate. They
3 serve the upstate. They have an office in the
4 upstate, offer nontherapeutic foster care and
5 they've been licensed for several decades, is that
6 correct?

7 A. That is correct.

8 Q. Epworth Children's Home serve in the
9 upstate, have an office in the upstate, offer
10 nontherapeutic foster care and they've been
11 licensed for several years?

12 A. Several decades. And they also have
13 nontherapeutic and therapeutic.

14 Q. Okay. Growing Home Southeast. This is
15 over my notes are complete. I think they serve the
16 upstate. Do you know if they have an office in the
17 upstate?

18 A. They do not have an office in the
19 upstate, but they do work statewide.

20 Q. Okay. And they do both therapeutic and
21 nontherapeutic, is that right?

22 A. That's correct.

23 Q. And they've been licensed for 15 years
24 or so?

25 A. Or so, yes.

1 Q. Okay. Lutheran Services Carolinas.
2 They serve the upstate, they don't have an office
3 in the upstate, but they offer nontherapeutic and
4 therapeutic and they've been licensed for a couple
5 decades?

6 A. Correct.

7 Q. Okay.

8 A. Yes.

9 Q. Miracle Hill Ministries, which we've
10 talked about, they have an office in the upstate,
11 they do nontherapeutic foster care, they've been
12 licensed for several decades and they serve the
13 upstate?

14 A. Yes.

15 Q. New Foundations Home For Children, I
16 believe they serve the upstate, have an office in
17 the upstate, offer nontherapeutical foster care and
18 been licensed for several years, is that right?

19 A. Yes. That is correct.

20 Q. I think we're about halfway -- halfway
21 through the list. Thanks for hanging with me.

22 Nightlight Christian Adoptions serve
23 the upstate, have an office in the upstate,
24 nontherapeutic foster care, and they've been
25 licensed for several years?

1 A. They've been licensed for several years
2 as an adoption agency and only most recently added
3 foster care services to their list.

4 Q. Okay. Do you know when -- when they
5 were licensed as a CPA to be foster care?

6 A. It's probably been a couple of years,
7 not very long.

8 Q. Okay. Two to three, four years, that
9 ballpark?

10 A. That ballpark, yes.

11 Q. Okay. South Carolina MENTOR serve the
12 upstate. Do they have an office in the upstate, do
13 you know?

14 A. They do.

15 Q. Okay. They offer nontherapeutic foster
16 care, have been licensed for several decades --

17 A. Therapeutic --

18 Q. -- is that right?

19 A. Therapeutic and nontherapeutic services
20 are offered.

21 Q. Okay. South Carolina Youth Advocate or
22 SCYAP sometimes I think later referred to as, they
23 serve the upstate, they don't have an office in the
24 upstate, they do therapeutic and nontherapeutic and
25 they've been licensed for about 30 years, is that

1 right?

2 A. Yes.

3 Q. Okay. Southeastern Children's Home,
4 they serve the upstate. Do they have an office in
5 the upstate?

6 A. Southeastern, yes.

7 Q. Okay. They do nontherapeutic foster
8 care and it looks like they also have been licensed
9 for looks like about 40ish years. Does that sound
10 right?

11 A. Yes.

12 Q. Specialized Alternative For Family and
13 Youth, I think you said sometimes it's -- they go
14 by the acronym SAFY or SAFY?

15 A. SAFY.

16 Q. They serve the upstate, have an office
17 in the upstate, offer both therapeutic and
18 nontherapeutic and been licensed since the 1990s.
19 Is that all correct?

20 A. That is correct.

21 Q. Okay. Tamassee DAR School, if I'm
22 pronouncing that right, I think you said they
23 closed at some point in 2019. But prior to that,
24 and at least you said, into some part of 2019 they
25 were licensed as a CPA, is that --

1 A. That is -- that's correct.

2 Q. They do nontherapeutic foster care,
3 serve the upstate, they -- do you know if they have
4 an office in the upstate?

5 A. They did.

6 Q. Okay. The Bair Foundation has an
7 office in the upstate, serves the upstate, have
8 therapeutic and nontherapeutic foster care and
9 they've been licensed for about 20 years. Is that
10 all correct?

11 A. That's correct.

12 Q. Then -- let's see. Thornwell. Let's
13 see. Serves the upstate, office in the upstate,
14 nontherapeutic foster care and they've been
15 licensed for a number of years?

16 A. Um-hum. Yes.

17 Q. And then I think the last -- the last
18 one, this is one that I have written in, so -- from
19 your testimony -- so correct me here. I can't read
20 my own writing. Family Preservation? Is that --

21 A. Um-hum. Family Preservation Community
22 Services.

23 Q. Okay. So they serve the upstate. Do
24 they have an office in the upstate?

25 A. They serve statewide, but they do not

1 have an office in the upstate.

2 Q. Okay. They do nontherapeutic foster
3 care?

4 A. And therapeutic.

5 Q. And do you know ballpark how long
6 they've been licensed as a CPA?

7 A. It's been awhile, so certainly more
8 than ten years.

9 Q. Okay. I just wanted to -- for the ones
10 we just -- we just discussed, I think it's around
11 15 or 16 or so that at least serve the upstate,
12 some of them you said don't have an office here.
13 I'm trying to find an example.

14 Southeastern Children's Home, they
15 do --

16 A. Right.

17 Q. So let's use Southeastern as an
18 example. If -- if I wanted to be licensed as a
19 foster parent, I did a Google search for a foster
20 care agency in Greenville, South Carolina and I
21 think -- I just like the sound of that name, I
22 click on it. If I wanted to talk to and to apply
23 through that to DSS, how would I go about doing
24 that if they don't have an office?

25 A. You would -- sure. There is a main